



BLACK LEADERSHIP FORUM, INC.

September 28, 2006

Chairman Kevin Martin
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
Fax: (202) 418-2801

RE: FCC Docket #97-80

Dear Chairman Martin:

Founded in 1977 in Washington, DC, as a confederation of civil rights, political and service organizations, the Black Leadership Forum, Inc. (BLF) is a 501(c)(3) organization consisting of the leadership of twenty-eight member organizations, including the National Association for the Advancement of Colored Persons (NAACP), Blacks in Government (BIG), the Congressional Black Caucus (CBC), the National Association for the Advancement of Colored People (NAACP), the National Urban League (NUL), and the Southern Christian Leadership Conference (SCLC), to name a few. I write in to urge that the Commission grant a temporary waiver of the so-called "integration ban" on cable set-top boxes.

This rule, slated to take effect in July 2007, would prohibit cable operators from leasing set-top boxes which integrate internally the critical "security" features - those features which enable customers to access programming to which they subscribe. Instead, the FCC rule, if allowed to take effect, would require cable operators to lease set-top boxes that require external, insertable CableCARDs. These external cards provide no added value to consumers but will cost them as much as \$600 million each year. Indeed, there is virtually no consumer demand for the "plug-and-play" devices which require the external cards.

Particularly troubling is the unnecessary nature of what can be only described as a regressive "tax" on cable customers. With gas prices spiraling through the roof and wages stagnant, the federal government should be seeking ways to provide working Americans relief. Instead, the FCC appears poised to allow a regulation to go into effect which would saddle consumers with added costs and give them nothing tangible in return.

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The Black Leadership Forum would certainly support FCC rules designed to usher in new competitive technologies and equipment designed to help consumers navigate their incoming cable signals. Downloadable security technologies, for example, will allow next generation digital TVs to navigate cable signals without imposing unnecessary costs on consumers. A backward looking FCC "integration ban" rule, however, will divert resources that could be better invested in these newer technologies.

The Black Leadership Forum thus urges that the FCC grant waivers of the pending "integration ban" rules, and to instead harness its energies towards the advancement of new technologies that will encourage competition and bring consumers tangible benefits.

Sincerely,



Joe Leonard, Jr., Ph.D.
Executive Director
Black Leadership Forum